

# EXHIBIT A

**From:** Eli Mosley <deplorabletruth@gmail.com>  
**Sent:** Friday, July 17, 2020 10:16 AM  
**To:** Jessica Phillips <jphillips@bsflp.com>; oyceJ@vawd.uscourts.gov; Heidi Wheeler <HeidiW@vawd.uscourts.gov>  
**Cc:** eli.f.mosley@gmail.com; eli.r.kline@gmail.com; Michael Bloch <mbloch@kaplanhecker.com>  
**Subject:** Re: your deposition

Hello,

Due to the current Covid-19 situation and not having a cell phone with internet access I have been largely without a phone that can log into my email until today. I was unaware of this deposition being scheduled when it was for July 2nd, and thought it was scheduled for this week or next. I will be available to reschedule my deposition sometime during the next three weeks as I will have internet/phone during this time in order to participate. I fully intend to give my deposition for the case so please let me know when we can reschedule. Thank you and I apologize for missing the originally scheduled meeting.

Elliott Kline,

On Thu, Jul 2, 2020 at 10:27 AM Jessica Phillips <[jphillips@bsflp.com](mailto:jphillips@bsflp.com)> wrote:

Mr. Kline:

Plaintiffs in *Sines v. Kessler* have noticed your deposition for today beginning at 9:30 am ET. See the attached deposition notice that was sent to you by email on June 1, 2020. Plaintiffs' counsel is on the video conference with the videographer and court reporter waiting for you to join. I am attaching the relevant access information that was sent to you by email last night.

If you do not appear for your deposition today, Plaintiffs will immediately notify the Court and will

seek all available remedies. Plaintiffs reserve all rights.

**Jessica E. Phillips**

Partner

---

**BOIES SCHILLER FLEXNER LLP**

1401 New York Ave., NW

Washington, DC 20005

(t) +1 202 895 7592

(m) +1 312 493 7114

[jphillips@bsfllp.com](mailto:jphillips@bsfllp.com)

[www.bsfllp.com](http://www.bsfllp.com)

---

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1 08201831BSF]

---

*This email and its attachments may contain information that is confidential and/or protected from disclosure by the attorney-client, work product or other applicable legal privilege. If you are not the intended recipient of the email, please be aware that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please notify the sender immediately and destroy all copies of the message from your computer system. Thank you.*